

GIBBONS P.C.

Robert K. Malone, Esq.
Brett S. Theisen, Esq.
Christopher P. Anton, Esq.
Kyle P. McEvilly, Esq.
One Gateway Center
Newark, New Jersey 07102-5310
Telephone: (973) 596-4500
Email: rmalone@gibbonslaw.com
btheisen@gibbonslaw.com
cantan@gibbonslaw.com
kmcevilly@gibbonslaw.com

Counsel to BML Properties, Ltd.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

CCA Construction, Inc.,¹

Debtor.

(Hon. Christine M. Gravelle)

Chapter 11

Case No. 24-22548-CMG

**DECLARATION OF BRETT S. THEISEN
IN SUPPORT OF BML PROPERTIES, LTD.'S OMNIBUS OBJECTION**

BRETT S. THEISEN, of full age, under penalty of perjury, hereby declares as follows:

1. I am an attorney at law admitted to practice in the State of New Jersey and a Director with Gibbons P.C. ("Gibbons"), located at 1 Gateway Ctr, Newark, NJ 07102, counsel to BML Properties, Ltd. ("BMLP") in the above-captioned bankruptcy proceeding (the "Chapter 11 Case").

¹ The last four digits of CCA's federal tax identification number are 4862. CCA's service address for the purposes of this chapter 11 case is 445 South Street, Suite 310, Morristown, NJ 07960.

2. I submit this declaration, in support of the *Omnibus Objection of BML Properties, Ltd.* (the “Objection”), filed contemporaneously herewith.² Unless stated otherwise, I have personal knowledge of the facts set forth herein.

Publicly Available Documents

3. Attached hereto as Exhibit 1 is a true and correct copy of a CCA press release, dated October 19, 2017.

4. Attached hereto as Exhibit 2 is a true and correct copy of an *Octus* article, dated May 21, 2024.

Deposition Transcripts

5. Attached hereto as Exhibit 3 is a true and correct copy of the rough transcript of the February 3, 2025 deposition of Elizabeth Abrams.

6. Attached hereto as Exhibit 4 is a true and correct copy of the rough transcript of the February 4, 2025 deposition of Evan Blum.

7. Attached hereto as Exhibit 5 is a true and correct copy of the rough transcript of the February 5, 2025 deposition of JiChao Xu.

Documents Produced by CCA and CSCEC Holding

8. Attached hereto as Exhibits 6-66 are the following documents produced by CCA and/or CSCEC Holding in connection with the DIP Motion and/or Cash Management Motion:

Bates No.	Exhibit No.
CCA-BK0000001	6
CCA-BK0000032	7
CCA-BK0000104	8

² Capitalized terms used herein but not defined have the meanings ascribed to them in the Objection.

CCA-BK0000143	9
CCA-BK0000194	10
CCA-BK0000305	11
CCA-BK0000322	12
CCA-BK0000326	13
CCA-BK0000519	14
CCA-BK0000527	15
CCA-BK0000975	16
CCA-BK0001164	17
CCA-BK0001913	18
CCA-BK0001922	19
CCA-BK0001927	20
CCA-BK0001929	21
CCA-BK0001938	22
CCA-BK0002272	23
CCA-BK0002286	24
CCA-BK0002722	25
CCA-BK0003028	26
CCA-BK0003088	27
CCA-BK0003100	28
CCA-BK0003110	29
CCA-BK0003122	30
CCA-BK0003144	31

CCA-BK0003173	32
CCA-BK0003174	33
CCA-BK0003222	34
CCA-BK0004523	35
CCA-BK0004880	36
CCA-BK0007230	37
CCA-BK0007818	38
CCA-BK0007977	39
CCA-BK0008244	40
CCA-BK0008578	41
CCA-BK0008824	42
CCA-BK0008953	43
CCA-BK0011878	44
CCA-BK0011954	45
CCA-BK0011968	46
CCA-BK0011972	47
CCA-BK0011985	48
CCA-BK0011988	49
CCA-BK0011991	50
CCA-BK0012023	51
CCA-BK0012490	52
CCA-BK0012717	53
CCA-BK0012722	54

CCA-BK0012947	55
CCA-BK0012949	56
CCA-BK0013396	57
CCA-BK0014065	58
CCA-BK0014214	59
CCA-BK0014294	60
CCA-BK0014638	61
CCA-BK0014647	62
CSCECHolding_0000000002	63
CSCECHolding_0000000099	64
CSCECHolding_0000000276	65
CSCECHolding_0000000282	66

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed on: February 7, 2025

/s/ Brett S. Theisen
Brett S. Theisen